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October 13, 2021

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
and Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MH**

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant Samsung Electronics America, Inc. ("SEA") in the above-referenced matter. Together with Plaintiffs' counsel, Mitchell Breit, we are providing a joint status report in furtherance of the Court's request of October 6, 2021.

We are pleased to report that a mediation with the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) has resulted in a Settlement Agreement. In fact, the parties are presently involved in the final exchange of signatures and other action necessary to consummate the settlement. We hope to complete this process in the next few weeks and will provide the Court with an update in early November 2021, if Your Honor deems this acceptable.

The Honorable Michael A. Hammer  
United States Magistrate Judge  
October 13, 2021  
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Respectfully,

*/s/ James J O'Hara*

JAMES J. O'HARA  
On behalf of Defendant,  
Samsung Electronics America, Inc.

Respectfully,

*/s/ Mitchell Breit*

MITCHELL BREIT  
On behalf of Plaintiffs

JJO/js  
Cc: All counsel (by ECF)